FILED

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS PECOS DIVISION

JUN 1 0 2021

CLERK, U.S. DISTRIC

UNITED STATES OF AMERICA,

Plaintiff.

v.

HERIBERTO VASQUEZ,

Defendant.

§ NO. P. 2R1 CR

INDICTMENT

[Vio: Count 1: 8 U.S.C. §§

1324(a)(1)(A)(v)(I) & (B)(i), Conspiracy to Transport Illegal Aliens; Count 2: 18 U.S.C. §§ 553(a)(1) Exportation of Stolen Vehicle]

THE GRAND JURY CHARGES:

**COUNT ONE** [8 U.S.C. §§  $\overline{1324}(a)(\overline{1)(A)}(v)(I) & (B)(i)$ ]

That on or about May 19, 2021, in the Western District of Texas, Defendant.

## HERIBERTO VASQUEZ,

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, within the United States, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law.

A violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (B)(i).

**COUNT TWO** [18 U.S.C. §§ 553(a)(1)]

That on or about April 6, 2021, in the Western District of Texas, Defendant,

HERIBERTO VASQUEZ,

did knowingly export a motor vehicle, to wit, a 2017 Dodge Journey having VIN 3C4PDDEG2HT616328, knowing the same to have been stolen.

A violation of Title 18, United States Code, Section 553(a)(1)

A TRU**Original signed by the** foreperson of the Grand Jury

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF

UNITED STATES ATTORNEY

RY.

**KEVIN EATON** 

ASSISTANT UNITED STATES ATTORNEY